

LEVIN SEDRAN & BERMAN LLP

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

CASE NO. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates: ALL CASES

**APPLICATION OF MICHAEL M. WEINKOWITZ
FOR AN APPOINTMENT TO THE
PLAINTIFFS' STEERING COMMITTEE**

Pursuant to the *Order Setting Initial Conference* (ECF 2), the undersigned respectfully submits this Application for appointment to the Plaintiffs' Steering Committee ("PSC"), and in support submits the attached Letter and the following Exhibits:

- Exhibit 1: *Curriculum Vitae* of Michael M. Weinkowitz and Levin Sedran & Berman, LLP;
- Exhibit 2: Names and contact information of Judge; and,
- Exhibit 3: Other Attorneys' Support for the PSC Application of Michael M. Weinkowitz.

Dated: October 20, 2022

Respectfully submitted,

/s/ Michael M. Weinkowitz
Michael M. Weinkowitz, Esquire
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OF COUNSEL:
HOWARD J. SEDRAN
SANDRA L. DUGGAN
RAYMOND P. FORCENO

*also admitted in New Jersey
+also admitted in New York

October 20, 2022

The Honorable Yvonne Gonzalez Rogers, U.S.D.J.
Oakland Courthouse
1301 Clay Street
Oakland, CA 94612

**RE: *In re: Social Media Adolescent Addiction/Personal Injury Prod. Liab. Lit.,*
MDL No. 3047 (4:22-md-03047-YGR)**

Dear Judge Rogers:

I respectfully submit this application to be appointed to the Plaintiffs' Steering Committee ("PSC"). As set forth below, I welcome the opportunity to devote my time, knowledge, experience, and the resources of my law firm to serve on the PSC of MDL 3047. I have always worked cooperatively, with integrity and the utmost professionalism, to maximize results for plaintiffs. I will do the same in this case. My firm represents injured Plaintiffs, many of whom are LGBTQ youth. As a member of the LGBTQ community, I am in a unique position to understand the needs of LGBTQ youth who have been addicted and injured by the design features of social media platforms.

I. PROFESSIONAL EXPERIENCE

I am a partner in Levin Sedran & Berman, LLP ("LSB") in Philadelphia, Pennsylvania. I have been admitted to practice law in Pennsylvania and New Jersey since 1995, and I am admitted to practice law in New York. I am admitted to the United States District Courts for the Eastern District of Pennsylvania, the District of New Jersey, the Eastern and Southern Districts of New York, and the United States Court of Appeals for the Third Circuit and have been admitted *pro hac vice* to numerous federal courts where I have appeared. My peers have bestowed upon me an "AV" Pre-eminent for the quality of my legal work, professionalism, and ethics. I routinely lecture in the area of complex litigation and mass torts.

As outlined in Section I of the *Curriculum Vitae* ("CV") attached [**Exhibit "1"**], I have extensive professional experience in complex litigation, having been formally appointed by Courts to leadership positions, having been appointed to committee or subcommittee positions by formal leadership in cases, and by having had *de facto* roles where my assistance to leadership in complex cases has propelled me into advanced responsibilities.

I was appointed (and reappointed) by Judge William Orrick to serve on the PSC in *In re: JUUL Labs. Inc. Marketing, Sales Practices and Prod. Liab. Lit.* (MDL 2913). I have led and managed multiple teams as Co-Chair of the Discovery Committee, Chair of the Law and Briefing Committee, and a member of the Plaintiff Trial Team. In addition to my broad MDL experience in complex cases as

outlined in Exhibit “1,” I have extensive experience as the court-appointed Plaintiffs’ Liaison Counsel in consolidated mass tort actions litigated in state court in Pennsylvania.¹ In these leadership positions, I demonstrated the ability to facilitate cooperation among attorneys with divergent and competing interests to achieve common goals. I had all the responsibilities of lead counsel and liaison counsel’s administrative and organizational duties. On behalf of thousands of plaintiffs who filed cases in both the *Yaz* and *Xarelto* litigations in Pennsylvania, I worked directly with defense counsel and the Court; appeared at monthly status conferences; argued numerous motions; negotiated hundreds of Case Management Orders; conducted written discovery and corporate depositions (cross-noticed in the parallel MDL actions); wrote and oversaw the filing of complex legal briefs; negotiated Bellwether trial programs with defense counsel and served on Bellwether trial teams. My responsibilities included successfully facilitating state-federal coordination. I was also a member of the joint state-federal Settlement Committees that negotiated and implemented global settlements in each litigation.

Attached as **Exhibit “2”** is a list of the names and contact information of the Judges that I have appeared before in the matters listed on Exhibit “1.”

II. WILLINGNESS AND ABILITY TO IMMEDIATELY COMMIT TO TIME-CONSUMING LITIGATION

I am prepared to immediately devote the significant time I have available to this litigation.

III. WILLINGNESS AND ABILITY TO WORK COOPERATIVELY WITH OTHER PLAINTIFFS COUNSEL AND DEFENSE COUNSEL

LSB attorneys pride themselves on forming productive and collegial relationships with their co-counsel and defense counsel and believe such cooperative working relationships are necessary for effective representation. I pledge my fidelity to this litigation and willingness to work cooperatively with other Plaintiffs’ Counsel, some of whom have already acknowledged my capacity to work well with others by their willingness to endorse my position on the PSC. [**Exhibit “3”**]. Likewise, I have worked well with defense counsel in the leadership roles that I have had in both federal MDLs and in the state court mass tort litigations. I am confident counsel will attest as much were the Court to inquire of them.

IV. ACCESS TO RESOURCES TO PROSECUTE THE LITIGATION IN A TIMELY MANNER

I have access to the resources of my firm to support my abilities to prosecute this case in a timely manner. My firm self-funds litigation of complex cases without relying on third-party funding entities. It will self-fund the costs that my firm will incur in this litigation if I have the honor of being appointed. LSB routinely advances substantial sums on behalf of clients in complex cases, recovery of which is contingent upon the successful prosecution of the case. We are prepared to do so here.

My firm has committed me and other members of the firm to this case to ensure that it is efficiently prosecuted to a successful conclusion for plaintiffs. My firm has sufficient resources and commitment to provide the partners, associates, paralegals, IT services, and staff necessary to zealously prosecute the claims at issue in this MDL. If additional resources are necessary, LSB will supply them. The firm is comprised of attorneys who are well-versed in all stages of litigation against large corporate defendants and their well-funded defense counsel. Having practiced exclusively in complex and class-action litigation with a focus on product liability since its inception over three decades ago, LSB recognizes the commitment of financial and personnel resources this litigation will entail.

¹ *In re Xarelto Prod. Liab. Litig.*, Jan. Term 2015, No. 2349 and *In re Yaz Prod. Liab. Litig.*, Sept. Term 2009, No. 1307 (First Judicial District, Pennsylvania, Philadelphia Court of Common Pleas).

The resources that my firm will provide to this litigation include the expertise that comes from being one of the nation's preeminent and most experienced plaintiffs' complex litigation, product liability, and class-action firms. *See* CV, Exhibit "1," Section II. My firm has extensive experience and expertise litigating product liability, consumer protection, data breach, privacy, antitrust, securities, and other complex class-action cases.

Through over 35 years of serving its clients, the firm's attorneys have gained national recognition for their experience and skill and are frequently called upon to lead some of the country's largest class actions and mass torts. For example, Courts have appointed the firm as lead counsel or to other leadership positions in hundreds of cases, which includes more than forty MDLs. LSB presently serves or has served in several of the nation's largest and most technically complex class actions and mass tort litigations. *See* CV, Section II, Exhibit "1"

As a result of the firm's success in representing clients and putative class members in complex litigation throughout the country, LSB has been distinguished as a Tier I class-action and personal injury/mass tort firm in the "Best Law Firms" rankings published in the *U.S. News and World Report*, Best Law Firms. Members of the firm are listed in the LEGAL 500, LAW DRAGON 500, Martindale Hubbell's *Directory of Preeminent Attorneys*, "Best Lawyers In America," and the National Trial Lawyers Top 100 Lawyers.

V. OTHER CONSIDERATIONS

Aside from the strong support of other attorneys in this litigation [**Exhibit 3**], I believe my firm's reputation, as evidenced by the accolades of numerous judges, further supports my application. Courts have consistently commented on the high-quality nature of the firm's work. For example, in *In re Three Mile Island Litigation*, Judge Rambo favorably acknowledged the quality of the work of LSB in her opinion. *See In re Three Mile Island Litigation*, 557 F. Supp. 96 (M.D. Pa. 1982). In the *Lazy Oil Co. v. Witco Corp., et al.*, C.A. No. 94-110E (W.D. Pa.) (Plaintiffs' Co-Lead Counsel), the district court made the following comments concerning the work of LSB: "[t]he Court notes that the class was represented by very competent attorneys of national repute as specialists in the area of complex litigation. As such, Class Counsel brought considerable resources to the Plaintiffs' cause. The Court has had the opportunity to observe Class Counsel first-hand during the course of this litigation and finds that these attorneys provided excellent representation to the Class. The Court specifically notes that, at every phase of the litigation, Class Counsel demonstrated professionalism, preparedness, and diligence in pursuing their cause." In *In re Orthopedic Bone Screw Products Liability Litigation*, MDL No. (1014). 2000 WL 1622741, at *7 (E.D. Pa. Oct. 23, 2000) (Plaintiffs' Lead Counsel), the Court stated: "the Court also finds that the standing and expertise of counsel for [plaintiffs] is noteworthy. First class counsel is of high caliber and most PLC members have extensive national experience and similar class-action litigation. Furthermore, the Court noted that the quality of the legal services rendered was of the highest caliber. In *In re Diet Drugs Product Liability Litigation*, MDL No. 1203 (E.D. Pa.) (Plaintiffs' Co-Lead Counsel), the court stated: "The Court recognized the 'remarkable contribution' from LSB in the creation of the largest nationwide personal injury settlement to date."

Thank you for considering my application for a position on the PSC, and I look forward to appearing before you on November 8, 2022.

Respectfully submitted,



Michael M. Weinkowitz

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
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PRODUCTS LIABILITY LITIGATION

CASE NO. 4:22-MD-03047-YGR
MDL No. 3047

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EXHIBIT “1”

***CURRICULUM VITAE OF MICHAEL M. WEINKOWITZ AND
LEVIN, SEDRAN & BERMAN, LLP***

Dated: October 20, 2022

Respectfully submitted,

/s/ Michael M. Weinkowitz
Michael M. Weinkowitz, Esquire
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I. RELEVANT PROFESSIONAL EXPERIENCE OF MICHAEL M. WEINKOWITZ

- ***In re: JUUL Labs. Inc. Marketing, Sales Practices and Prod. Liab. Lit.* MDL 2913, (N.D. Cal) (Judge William H. Orrick)-** Appointed (and reappointed) to serve as a member of the Plaintiffs' Steering Committee. Serving as Chair of Law and Briefing and Co-Chair of the Discovery Committee, and a member of the bellwether trial team.
- ***In re Xarelto Prod. Liab Litig.*, MDL 2592 (E.D. La.) (Judge Eldon E. Fallon)-** Appointed to serve as state-federal liaison counsel. Served on the Discovery Committee and the federal/state Bellwether trial teams that tried six bellwether cases in the MDL and state court. Served as Plaintiffs' Liaison counsel in the consolidated mass tort litigation in Pennsylvania, *In re Xarelto Prod. Liab. Litig.*, Jan. Term 2015, No. 2349 (First Judicial District of Pennsylvania) (Judge Arnold L. New). Responsibilities in state court included all the duties of a lead counsel, including trial and global settlement negotiations and implementation, and facilitating state-federal coordination. Member of the Settlement Committee that negotiated and implemented a global settlement. This case is presently proceeding through the settlement.
- ***In re Tylenol Marketing, Sales Practices and Prod. Liab. Litig.*, MDL 2436 (E.D. Pa.) (Judge Lawrence F. Stengel)-** Served as Liaison Counsel and Chair of the both the Discovery and Law and Briefing Committees. Member of the Settlement Team that negotiated the global settlement that was reached. This case is settled.
- ***In re YAZ Prod. Liab Litig*, MDL 2100 (S.D. Ill.) (Judge David R. Herndon)-** Member of the Discovery Committee. Court-appointed Plaintiffs' Liaison Counsel in the consolidated mass tort action in Pennsylvania, *In re Yaz/Yasmin/Ocella Prod. Liab. Litig*, Sept. Term 2009, No. 1307 (First Judicial District of Pennsylvania) (Judge Arnold L. New). Responsibilities in the state court litigation included all the duties of a lead counsel including trial and global settlement negotiations and implementing and facilitating state-federal coordination. Member of the Settlement Committee that negotiated and implemented global settlements. This case is settled.
- ***In re Pradaxa Prod. Liab. Litig*, MDL 2384 (S.D. Ill.) (Judge David R. Herndon)-** Member of the Court appointed Plaintiffs' Steering Committee responsible for discovery and trial preparation. This case is settled.
- ***In re Johnson and Johnson Talcum Powder Products Marketing, Sales Practices and Prod. Liab. Litig.* (MDL 2738) (D.N.J.) (Judge Freda Wolfson)-** Member of the Law and Briefing Committee.
- ***In re Fresenius Granuflo/Naturalyte Dialysate Prod. Liab. Litig.* (MDL 2428) (D. Mass) (Judge Douglas P. Woodlock)-** Co-Chair of the Discovery Committee. Oversaw extensive written discovery and deposition program. This case is settled.
- ***In re Vioxx Prod. Liab. Litig*, MDL No. 1657 (E.D. La.) (Judge Eldon E. Fallon)-** Member of the Science Committee and the Joint Defense and Plaintiff Review Settlement Subcommittee. This case is settled.
- ***In re Phenylpropanolamine (PPA) Prod. Liab. Litig*, MDL 1407 (W.D. Wash.) (Judge Barbara J. Rothstein)-** Member of the Discovery Committee. This case is settled.

II. LEVIN SEDRAN AND BERMAN, LLP

Levin Sedran & Berman, LLP (“LSB”) has a national reputation for superior client service and results in representing clients in cases across the nation. Through almost 40 years our attorneys have gained national recognition for their experience and skill and are frequently called upon to lead some of the largest class actions, mass torts, and antitrust cases in the nation. Our stock-and-trade is the litigation of technically complex cases, usually pending in an MDL or in consolidated state-court litigation. We have been appointed lead counsel or to other leadership positions in hundreds of cases, including more than forty MDLs. LSB is presently serving or has served in several of the largest and technically complex class actions nationwide. We regularly appear in federal courts throughout the country. *Klein v. Facebook, Inc.*, No. 20-cv-8570 (N.D. Cal.) (Plaintiff’s Executive Committee); *In Re: Philips Recalled CPAP, Bi-Level Pap, and Mechanical Ventilator Prod. Litig.*, MDL 3014 (W.D. Pa.) (Lead Counsel); *In re Capacitors Antitrust Litig.*, Case No. 3:14-cv-03264-JD (N.D. Cal.) (Direct Purchaser Trial Team); *In re Zantac Prod. Liab. Litig.*, MDL No. 2924 (S.D. Fla.) (Plaintiffs’ Steering Committee); *In re Aqueous Film-Forming Foams Products Liability Litigation*, MDL 2873 (D.S.C.) (Plaintiffs’ Steering Committee); *In re Chinese-Manufactured Drywall Product Liab. Litig.*, MDL No. 2047 (E.D. La.) (Lead Counsel); *In re NFL Players’ Concussion Injury Litig.*, MDL No. 2323 (E.D. Pa.) (Plaintiffs Steering Committee and Subclass Counsel for Settlement); *In re Oil Spill by the Oil Rig “Deepwater Horizon” in the Gulf of Mexico*, on April 20, 2010, MDL No. 2179 (E.D. La.) (Special Counsel to the Plaintiffs’ Fee and Cost Committee); *In re Air Cargo Shipping Servs. Antitrust Litig.*, MDL No. 1775 (E.D. N.Y.) (Co-Lead Counsel); *In re Wells Fargo Insurance Marketing Sales Practices Litig.*, MDL No. 2797 (C.D. Ca.) (Plaintiffs’ Executive Committee); *In re Apple Inc. Device Performance Litig.*, MDL No. 2827 (N.D. Ca.) (Plaintiffs’ Executive Committee) and *In re Intel Corp. CPU Marketing Sales Practices and Prod. Liab. Litig.* MDL No. 2828 (C.D. Or.) (Plaintiffs’ Executive Committee to represent the interests of governmental entities). Our firm’s philosophy from leading and prosecuting complex class actions for over three decades is to prosecute the action efficiently, vigorously, and zealously on behalf of our clients.

LSB has pioneered the use of class actions and mass actions in the United States, and its work has resulted in numerous record-breaking recoveries over the past four decades. *See e.g., In re Asbestos School Litig.*, No. 83-0263 (E.D. Pa.) (LSB as member of Executive Committee and Lead Trial Counsel obtained a certification of a nationwide class and settlement on behalf of school districts); *In re Three Mile Island Litig.*, Civil Action No. 79-0432 (M.D. Pa.) (LSB as a member of Executive Committee obtained a settlement including the establishment of a medical monitoring fund); *In re Diet Drug Prod. Liab. Litig.*, MDL No. 1203 (E.D. Pa.) (LSB as Co-Lead Counsel obtained a \$6.75 billion-dollar settlement on behalf of consumers who ingested Fen Phen); *In re The Exxon Valdez*, No. 89-00095 (D. Alaska) (LSB as a member of the Trial and Discovery Committee represented fishermen, native corporations, native villages, native claims and business claims in this mass tort.); *In re Chinese-Manufactured Drywall Prod. Liab. Litig.*, MDL No. 2047 (E.D. La.) (LSB as Lead Counsel obtained inter-related settlements involving various suppliers, builders, installers, insurers and manufacturers of Chinese drywall valued in excess of \$1 billion dollars); *In re Vioxx Prod. Liab. Litig.*, MDL No. 1657 (E.D. La.) (As a member of the PSC and Plaintiffs’ Negotiating Committee, LSB was instrumental in achieving a \$4.85 billion-dollar settlement on behalf of consumers who ingested Vioxx); *In re Air Cargo Shipping Servs. Antitrust Litig.*, MDL No. 1775 (E.D. N.Y.) (As Co-Lead Counsel in the decade long air cargo antitrust litigation LSB obtained 28 inter-related settlements against air cargo service providers totaling \$1.2 billion dollars); *Galanti, et al. v. The Goodyear Tire and Rubber Co.* (“Entran II”), Civil Action No.: 03-209 (D.N.J.) (As a member of the Executive Committee LSB was instrumental in negotiating and achieving the creation of a common fund in the amount of \$344,000,000); and *In re NFL Players Concussion Injury Litig.* MDL No. 2323 (E.D. Pa.) (LSB as Subclass Counsel working along with Lead Counsel obtained an uncapped settlement valued in excess of \$1 billion dollars on behalf of Retired NFL football players).

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

CASE NO. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates: ALL CASES

EXHIBIT “2”

**JUDICIAL CONTACT LIST
FOR PSC APPLICATION OF MICHAEL M. WEINKOWITZ**

JUDICIAL CONTACT LIST
FOR PSC APPLICATION OF MICHAEL M. WEINKOWITZ

In re: JUUL Labs. Inc. Marketing, Sales Practices and Prod. Liab. Lit., MDL 2913 (N.D. CA)

William H. Orrick, U.S.D.J.
San Francisco Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102
(415) 522-2006

In re Xarelto Prod. Liab Litig., MDL 2592 (E.D. La.)

Eldon E. Fallon, U.S.D.J.
U.S. District Court Eastern District of Louisiana
500 Poydras Street
Room C456
New Orleans, LA 70130
(504) 589-7545

In re Xarelto Prod. Liab. Litig., Jan. Term 2015, No. 2349 (First Judicial District, Pennsylvania)

Arnold L. New, J.
Supervising Judge
Court of Common Pleas of Philadelphia County
606 City Hall
Philadelphia, PA 19107
(215) 686-7260

In re Yaz Prod. Liab Litig, MDL 2100 (S.D. Ill.)

David R. Herndon, U.S.D.J. (retired)
Herndon Resolution, LLC
PO Box 897
Edwardsville, IL 62025
(618) 973-0778

In re Yaz Prod. Liab.. Lit., Sept. Term 2009, No. 1307 (First Judicial District, Pennsylvania)

Arnold L. New, J.
Supervising Judge
Court of Common Pleas of Philadelphia County
606 City Hall
Philadelphia, PA 19107
(215) 686-7260

and

Sandra Mazer Moss, J. (retired)
DRI
Two Logan Square, Suite 660
Philadelphia PA 19103
(215) 656-4374

In re Pradaxa (Dabigatran Etexilate) Prod. Liab. Litig, MDL 2384 (S.D. Ill.)

David R. Herndon, U.S.D.J. (retired)
Herndon Resolution, LLC
PO Box 897
Edwardsville, IL 62025
(618) 973-0778

In re Tylenol (Acetaminophen) Marketing, Sales Prac. and Prod. Liab. Litig., MDL 2436 (E.D. Pa.)

Lawrence F. Stengel, U.S.D.J. (retired)
Saxton & Stump
280 Granite Run Drive
Suite 300
Lancaster, PA 17601
(717) 556-1080

In re Vioxx Prod. Liab Litig, MDL No. 1657 (E.D. La.)

Eldon E. Fallon, U.S.D.J.
U.S. District Court Eastern District of Louisiana
500 Poydras Street
Room C456
New Orleans, LA 70130
(504) 589-7545

In re Fresenius Granuflo / Naturalyte Dialysate Prod. Liab Litig (MDL 2428) (D. Mass)

Douglas P. Woodlock, U.S.D.J.
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210
(617) 748-9152

In re Johnson and Johnson Talcum Powder Products Marketing, Sales Practices and Prod. Liab Litig (MDL 2738) (D.N.J.)

Freda L. Wolfson, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608
(609) 989-2182

In re Phenylpropanolamine (PPA) Prod. Liab. Litig, MDL 1407 (W.D. Wash.)

Barbara J. Rothstein, U.S.D.J.
United States Courthouse
700 Stewart Street, Suite 16128
Seattle, WA 98101-9906
(206) 370-8840

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

CASE NO. 4:22-MD-03047-YGR
 MDL No. 3047

 This Document Relates: ALL CASES

EXHIBIT “3”

Given the extensive scope of this litigation, I support the Applications of the attorneys listed below, who I am thankful likewise support my Application:

- | | | |
|-------------------|-----------------|------------------------------|
| • Lexi Hazam | Lieff Cabraser | Co-Lead Counsel |
| • Emily Jeffcott | Morgan & Morgan | Co-Lead Counsel |
| • Chris Seeger | Seeger Weiss | Co-Lead Counsel |
| • Joseph VanZandt | Beasley Allen | Co-Lead Counsel |
| • Jennie Anderson | Andrus Anderson | Liaison Counsel |
| • Ron Austin | Ron Austin Law | Plaintiff Steering Committee |
| • James Bilborrow | Weitz Luxenberg | Plaintiff Steering Committee |
| • Paige Boldt | Watts Guerra | Plaintiff Steering Committee |

- | | | |
|---------------------|---------------------------------------|------------------------------|
| • Tom Cartmell | Wagstaff Cartmell | Plaintiff Steering Committee |
| • Jayne Conroy | Simmons Hanly Conroy | Plaintiff Steering Committee |
| • Carrie Goldberg | C.A. Goldberg Victims' Right Law Firm | Plaintiff Steering Committee |
| • Kirk Goza | Goza & Honnold | Plaintiff Steering Committee |
| • Sin-Ting Mary Liu | Aylstock, Witkin, Kreis & Overholtz | Plaintiff Steering Committee |
| • Andre Mura | Gibbs Law Group | Plaintiff Steering Committee |
| • Emmie Paulos | Levin, Papantonio, Rafferty | Plaintiff Steering Committee |
| • Roland Tellis | Baron & Budd | Plaintiff Steering Committee |
| • Alexandra Walsh | Walsh Law | Plaintiff Steering Committee |
| • Previn Warren | Motley Rice | Plaintiff Steering Committee |

Dated: October 20, 2022

Respectfully submitted,

/s/ Michael M. Weinkowitz
Michael M. Weinkowitz, Esquire
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